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January 16, 2024

**BY ECF**

Honorable Michael A. Hammer, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: *Gesture Technology Partners, LLC v. LG Electronics, Inc., et al.***  
**Civil Action No. 21 CV 19234 (EP) (MAH)**

Dear Judge Hammer:

This firm, along with Williams Simons & Landis PLLC, represents Plaintiff Gesture Technology Partners, LLC (“GTP”) in the above-referenced matter. Please accept this letter on behalf of GTP and Defendants LG Electronics Inc. and LG Electronics U.S.A., Inc. (collectively, “LG”) (collectively, the “Parties”) as a proposed scheduling order and three agreed upon dates for a teleconference pursuant to Your Honor’s January 3, 2024 Order (D.E. 89).

In accordance with this Court’s January 3, 2024 Order (D.E. 89), this schedule concerns only litigation regarding claim 4 of the ’949 patent. Should the Court grant GTP’s motion for leave to amend its February 17, 2023 infringement contentions, the parties respectfully request leave to amend the deadlines.



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**I. Proposed Scheduling Order**

<b>Event</b>	<b>Proposed Deadlines</b>
GTP's Motion to Amend Infringement Contentions D.E. 89 at fn. 5	January 26, 2024
LGE's Response to GTP's Motion to Amend Infringement Contentions	February 9, 2024
GTP's Reply in Support of its Motion to Amend Infringement Contentions	February 16, 2024
Non-Infringement Contentions <i>L. Pat. R. 3.2A</i>	March 12, 2024
Invalidity Contentions <i>L. Pat. R. 3.3</i>	March 12, 2024
Response to Invalidity Contentions <i>L. Pat. R. 3.4A</i>	March 26, 2024
Exchange of Proposed Terms for Construction <i>L. Pat. R. 4.1</i>	April 5, 2024
Deadline for Defendant to file dispositive motion challenging '949 patent pursuant to 35 U.S.C. § 101 <sup>1</sup>	April 15, 2024
Exchange of Preliminary Claim Constructions; Exchange Intrinsic and Extrinsic Evidence <i>L. Pat. R. 4.2(a) and 4.2(b)</i>	April 19, 2024
Exchange Intrinsic and Extrinsic Evidence that Each Party Intends to Rely Upon to Oppose Another Party's Construction <i>L. Pat. R. 4.2(c)</i>	April 26, 2024
Deadline for Plaintiff to file response to dispositive motion challenging '949 patent pursuant to 35 U.S.C. § 101	April 29, 2024

<sup>1</sup> Plaintiff GTP opposes a motion under 35 U.S.C. § 101 but does not oppose the date for filing the motion.



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Deadline for parties to meet and confer to narrow claim construction issues	May 1, 2024
Deadline for Defendant to file reply in support to dispositive motion challenging '949 patent pursuant to 35 U.S.C. § 101	May 6, 2024
Joint Claim Construction and Prehearing Statement and Expert Reports <i>L. Pat. R. 4.3</i>	May 8, 2024
Completion of Claim Construction Discovery <i>L. Pat. R. 4.4</i>	May 30, 2024
Defendant to serve Claim Construction Opening brief	June 6, 2024
Plaintiff to serve Responsive Claim Construction Briefs	June 20, 2024
Claim Construction Hearing <i>L. Pat. R. 4.6</i>	Counsel to confer pursuant to the local rule on June 27, 2024
Substantial Completion of Document Production	June 28, 2024
Expert Witness Discovery Deadline on Claim Construction <i>L. Pat. R. 4.5(b)</i>	July 3, 2024
Fact Discovery Deadline	July 30, 2024
Proposed date for settlement conference	TBD – July – August 2025, subject to the Court's availability
Opening Expert Reports	August 28, 2024
Rebuttal Expert Reports	October 3, 2024
Reply Expert Reports	October 24, 2024
All Expert Discovery	November 14, 2024
Deadline to File Dispositive Motions	December 5, 2024
Submit Final Pretrial Order	January 2, 2025
Pretrial Conference	TBD



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Trial	TBD
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**II. Three Agreed-Upon Dates for a Telephone Conference**

The Parties agree on the following dates for a telephone conference: January 23, January 24, and January 25.

We thank Your Honor for your continued attention to this matter. Should Your Honor have any questions, we are available at your convenience.

Respectfully submitted,

s/ James S. Richter

James S. Richter

Cc: All Counsel of Record (via ECF and Email)

